



STATE OF WASHINGTON
DEPARTMENT OF HEALTH
DIVISION OF ENVIRONMENTAL PUBLIC HEALTH
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To: Attn: East Waterway Proposed Plan
c/o Laura Knudsen
US EPA Region 10,
1200 6th Ave., Suite 155
Superfund Records Center, MS: 17-C04-1
Seattle, WA 98101

From: Emerson Christie, Toxicologist
Washington State Department of Health

RE: East Waterway Proposed Plan for Public Comment

Date: 11 August 2023

The Department of Health (DOH) has reviewed the East Waterway Proposed Plan for Public Comment (Plan). We appreciate the efforts made by the EPA in addressing environmental concerns in the East Waterway. The proposed interim action demonstrates a proactive step towards cleanup, and we are particularly pleased to see that the intention is for the East Waterway cleanup goals to mirror those already established for the Lower Duwamish Waterway.

DOH would like to acknowledge that there exists no physical barrier between the East Waterway and the Lower Duwamish Waterway preventing fish migration between the two cleanup sites. As such we are interested in understanding more about the approach to fish tissue sampling as it relates to monitoring for this plan.

DOH recommends that fish tissue monitoring for resident species and non-resident salmonids occur during each data collection period as fish consumption is the primary exposure route for humans to contamination in the waterway.

DOH recommends that an emphasis be placed on fish tissue sampling in areas of enhanced/monitored natural recovery as they are near existing fishing spots used by the community and represent a potential route of continued exposure through fish consumption.

DOH recommends that the human health risk assessment estimate for recreational anglers consider eight meals per month as opposed to one. Eight meals per month, or two fish meals per week, is considered by several authoritative bodies to be the level of fish consumption necessary for the health benefits of fish consumption. Therefore, the risk associated with consumption at this level should be considered the baseline for risk estimation.

DOH looks forward to working with the EPA on evaluating fish tissue data and other relevant data sets generated during this process for the health and safety of Washingtonians and the continued recovery of the Duwamish River.

Sincerely,

/s/Emerson Christie

Emerson Christie
Toxicologist
Site Assessments and Toxicology Section

Cc: Lenford O'Garro, Department of Health